



PATENT
P56964

REMARKS

The Office action of 28 July 2006 (Paper No. 20060720) has been carefully considered.

The Abstract is being amended as a matter of form, and claims 15 thru 17 are being amended. Thus, claims 1 thru 20 are pending in the application.

On page 2 of the Office action, the Examiner has acknowledged election of Species II, with traverse, in Applicants' Response to the restriction requirement filed on 13 July 2006, but made the restriction final. Applicants respectfully submit that restriction requirement should not be imposed in this application for the reasons previously stated which are incorporated by reference thereto.

On page 3 of the Office action, the Examiner objected to the Abstract "because of use of legal phraseology often used in patent claims" (quoting from page 3, lines 2-3 of the Office action). Specifically, the Examiner objected to the use of the word "comprises". Applicants respectfully disagree with the Examiner's objection on the grounds that the word "comprises" has not only a legal meaning within the context of patent claims, but also has a general meaning when used in the text of a document, such as a patent specification or abstract. Thus, the word "comprises" should be accepted for its general usage when employed in the abstract of a patent application. Nevertheless, in

order to further prosecution of this application, the word “comprises” is being amended to read “has” in the Abstract, and thus the objection to the Abstract should be withdrawn.

Claims 15 thru 17 are rejected under 35 U.S.C. §103 for alleged unpatentability over Burroughes *et al.*, British Patent Publication No. 2 349 979 in view of Winters *et al.*, U.S. Patent No. 6,737,800. For the reasons stated below, it is submitted that the invention recited in the claims, as now amended, is distinguishable from the prior art cited by the Examiner so as to preclude rejection under 35 U.S.C. §103.

Independent claim 15 is being amended to recite that each of the anode electrodes of the red, green and blue unit pixels includes a first film having a high reflectivity and forming a first anode and a second film for adjusting a work function and forming a second anode. Furthermore, independent claim 15 is being amended to recite that the second anode of at least one unit pixel of the red, green and blue unit pixels has a thickness different from thicknesses of the second anodes of other unit pixels of the red, green and blue unit pixels.

Dependent claims 16 and 17 are being amended in a corresponding manner, so that dependent claim 16 recites that the second anode of the red unit pixel is thicker than the second anodes of the other unit pixels, while claim 17 now recites a thickness of the second anode of the red unit pixel is in a range of one of 250 to 450Å and 700 to 750Å,

that a thickness of the second anode of the green unit pixel is in a range of one of 50 to 150Å and 200 to 300Å, and that a thickness of the second anode of the blue unit pixel is in a range of 50 to 150Å.

It is respectfully submitted that, as a result of these amendments, the invention recited in independent claim 15 is distinguishable from the prior art cited by the Examiner so as to preclude rejection under 35 U.S.C. §103, while dependent claims 16 and 17 provide further bases for distinguishing the invention from the cited prior art.

Specifically, neither Burroughes *et al.* '979 nor Winters *et al.* '800 discloses or suggests a method for fabricating an organic electroluminescent display wherein: (1) etching of first and second anode electrode materials results in the formation of anode electrodes of the red, green and blue unit pixels, wherein each of the anode electrodes of the red, green and blue unit pixels includes a first film having a high reflectivity and a second film for adjusting a work function; (2) wherein the first and second films contained in the anode electrodes of the red, green and blue unit pixels form a first anode and a second anode, respectively, in the red, green and blue unit pixels; and (3) wherein the second anode (or second films for adjusting a work function) of at least one unit pixel of the red, green and blue unit pixels has a thickness different from thicknesses of the second anodes (or second films for adjusting a work function) of other unit pixels of the red, green and blue unit pixels.

On page 3 of the Office action, the Examiner alleges that Burroughes *et al.* '979 discloses the disposition sequentially of a first anode material and a second anode material, followed by masking and etching the first and second anode materials to isolate and form anode electrodes of different pixels. However, on page 4 of the Office action, the Examiner admits that "Burroughes does not exemplify red, green and blue unit pixels and the second anode of at least one pixel having a thickness different from the thickness of the second anodes of other unit pixels of red, green and blue unit pixels" (quoting from page 4, lines 3-5 of the Office action). As a result, the Examiner cites Winters *et al.* '800 as allegedly disclosing "the thickness of the second anode electrode 112a in one pixel (red pixel) is different from the thicknesses of the second anodes 112b, 112c of other unit pixels of green and blue" (quoting from page 4, lines 12-14 of the Office action). However, since Winters *et al.* '800 does not disclose or suggest the etching of first and second anode electrode materials to form anode electrodes, each including a first film having a high reflectivity and a second film for adjusting a work function, it cannot be said that Winters *et al.* '800 discloses a method wherein the second film (or second anode) of at least one unit pixel of the red, green and blue unit pixels has a thickness different from thicknesses of the second films (or second anodes) of the pixels of the red, green and blue unit pixels, as recited in independent claim 15. Therefore, it is highly doubtful that one of ordinary skill in the art, upon reviewing the disclosure of Burroughes *et al.* '979, would be motivated or instructed to seek and obtain the disclosure of Winters *et al.* '800 so as to modify the disclosure of Burroughes *et al.* '979 in an effort to obtain

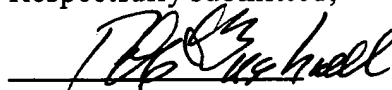
the claimed invention. It is respectfully submitted that the only reason that the Examiner has been able to arrive at the combination of the two references is that the Examiner, unlike one of ordinary skill in the art as of the date of the invention, has had the benefit of reviewing the disclosure of the present application, and has utilized the knowledge gained from the disclosure of the present application in order to arrive at the combination of references cited under 35 U.S.C. §103.

As mentioned above, dependent claims 16 and 17 provide further bases for distinguishing the invention from the cited prior art. That is to say, neither of the two references discloses or suggests a second anode (or second film) of the red unit pixel being thicker than the second anode (or second films) of the other unit pixels, as recited in dependent claim 16. Moreover, neither of the references, either alone or in combination, discloses or suggests the method wherein a thickness of the second anode (or second film) of the red unit pixel is in a range of one of the two recited ranges, wherein a thickness of the second anode (or second film) of the green unit pixel is in a range of one of the two recited ranges, and wherein a thickness of the second anode (or second film) of the blue unit pixel is in the recited range, as set forth in dependent claim 17.

In view of the above, it is submitted that the claims of this application are in condition for allowance, and early issuance thereof is solicited. Should any questions remain unresolved, the Examiner is requested to telephone Applicant's attorney.

No fee is incurred by this Amendment.

Respectfully submitted,



Robert E. Bushnell,
Attorney for the Applicant
Registration No.: 27,774

1522 "K" Street N.W., Suite 300
Washington, D.C. 20005
(202) 408-9040

Folio: P56964
Date: 10/27/06
I.D.: REB/JGS